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In reply, reference letter number: G-CAO-22-100910

U.S. Department of Transportation
Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE.
Washington, DC 20590

Subject: Response to Request for Clarification in Support of Revision to
Exemption No. 18556A – Exemption from Section 25.813(e) of Title 14
Code of Federal Regulations, Installation of Mid Cabin Pocket Doors

Reference(s):

- 1) Regulatory Docket No. FAA-2020-0108, Exemption No. 18556A, dated January 28, 2021, Exemption from Section 25.813(e) of Title 14, Code of Federal Regulations
- 2) G-CAO-22-100445, Request for Revision to Exemption No. 18556A – Exemption from Section 25.813(e) of Title 14 Code of Federal Regulations, Installation of Mid Cabin Pocket Doors, dated March 22, 2022
- 3) FAA letter in response to GAC letter G-CAO-22-100445, dated April 19, 2022
- 4) G-CAO-22-100798, Response to Request for Additional Information in Support of Revision to Exemption No. 18556A – Exemption from Section 25.813(e) of Title 14 Code of Federal Regulations, Installation of Mid Cabin Pocket Doors, dated May 19, 2022
- 5) FAA email in response to letter G-CAO-22-100798, dated May 26, 2022

ODA Project Number(s): AT-01-2015-0017

Dear Ms. Kuck:

Gulfstream is providing a response to FAA email dated May 26, 2022 (Reference 5), which requested additional clarification to support consideration of Gulfstream's request for an amendment to Exemption No. 18556A to add the Gulfstream GVIII-G800 model aircraft.

In accordance with 14 CFR Part 11, Gulfstream Aerospace Corporation requested consideration to revise Regulatory Docket No. FAA-2020-0108, Exemption No. 18556A, dated January 28, 2021 (Reference 1) originally issued to relieve the Gulfstream GVIII-G700 model aircraft from full compliance with 14 CFR 25.813(e) at amendment 25-116, Emergency Exit Access, for the

requirement that no door may be installed between any passenger seat that is occupiable for takeoff and landing and any passenger exit. Gulfstream requested a revision to the exemption to include the Gulfstream GVIII-G800 model aircraft, a derivative model of the GVI aircraft (Reference 2). In response to FAA additional information request (Reference 3), Gulfstream provided additional information to support consideration of Gulfstream's request for an amendment to Exemption No. 18556A (Reference 4).

Gulfstream is providing the following clarification to support consideration of the requested revision to the exemption to include the Gulfstream GVIII-G800 model aircraft, a derivative model of the GVI aircraft (Reference 2):

FAA Comment:

For item 4 on page 4, the initial proposal for the mid pocket door as noted in the regulation states "no door may be installed between any passenger seat that is occupiable for takeoff and landing and any passenger emergency exit, such that the door crosses any egress path (including aisles, crossaisles and passageways".

It is the FAA position that not all interior doors between passenger compartments are equivalent, and the FAA imposes different limitations on the different categories appropriate to produce an adequate level of safety for private-use operations. For your reference Gulfstream's exemption 17045 has information on the five categories of doors noted below:

Category 1: A door in a room and the room is less than the full width of the airplane. An aisle is outside the room. This type of room may be occupied during takeoff and landing, and only the occupants of the room must use the door to reach an exit.

Category 2: A door in a room that is the same as Category 1, except a single emergency exit or pair of emergency exits is within the room.

Category 3: A door, or doors, in a room and the room is the full width of the airplane. Passengers are seated on both sides (fore and aft) of the door(s), and the main aisle leads out of, or passes through, the room. The room does not have emergency exits. This type of room may be occupied during takeoff and landing.

Category 4: A door in a room and the room is the full width of the airplane. Passengers are seated on both sides (fore and aft) of the door, and a pair of emergency exits is at one end of the room. This type of room may be occupied during takeoff and landing.

Category 5: A door in a room that may be the full width of the airplane. This type of room is not occupied during takeoff and landing. This room is only occupied during flight. Passengers are not seated on both sides of the door during taxi, takeoff, and landing. Passengers seated in taxi, takeoff, and landing seats must not need to pass through this door to get to any emergency exits.

Letter G-CAO-22-100798 item 4 a notes "The Mid Cabin Pocket Doors will be open before entering any of the taxi, takeoff, and landing phases"... The FAA position is that doors that fall into Category 5 must be in the closed position during taxi, takeoff, and landing.

Can you please clarify if there are **Category 5** doors included in this exemption request. If these doors are included then the FAA will need to revise the exemption to address this category door.

Gulfstream response:

Gulfstream confirms that Category 5 doors are not included in this exemption request.

Should you have any further questions, or require any additional information, please contact CAO Airworthiness Engineering Specialist Andrea Burkhardt at Andrea.Burkhardt@gulfstream.com or (912) 251-1712 (office), or TC Program Administrator Tom Strohmayer at Thomas.Strohmayer@gulfstream.com, (912) 395-7778 (office) or (912) 433-6002 (mobile).

Respectfully,



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